

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

AUTHORS GUILD, DAVID BALDACCI,  
MARY BLY, MICHAEL CONNELLY,  
SYLVIA DAY, JONATHAN FRANZEN,  
JOHN GRISHAM, ELIN HILDERBRAND,  
CHRISTINA BAKER KLINE, MAYA  
SHANBHAG LANG, VICTOR LAVALLE,  
GEORGE R.R. MARTIN, JODI PICOULT,  
DOUGLAS PRESTON, ROXANA  
ROBINSON, GEORGE SAUNDERS,  
SCOTT TUROW, and RACHEL VAIL,  
individually and on behalf of others similarly  
situated,

Plaintiffs,

v.

OPENAI INC., OPENAI OPCO LLC,  
OPENAI GP LLC, OPENAI LLC, OPENAI  
GLOBAL LLC, OAI CORPORATION LLC,  
OPENAI HOLDINGS LLC, OPENAI  
STARTUP FUND I LP, OPENAI STARTUP  
FUND GP I LLC, OPENAI STARTUP  
FUND MANAGEMENT LLC, and  
MICROSOFT CORPORATION,

Defendants.

Case No. 1:23-cv-08292-SHS;

JONATHAN ALTER, KAI BIRD, TAYLOR  
BRANCH, RICH COHEN, EUGENE  
LINDEN, DANIEL OKRENT, JULIAN  
SANCTON, HAMPTON SIDES, STACY  
SCHIFF, JAMES SHAPIRO, JIA  
TOLENTINO, and SIMON WINCHESTER,  
on behalf of themselves and all others  
similarly situated,

Plaintiffs,

v.

OPENAI, INC., OPENAI GP, LLC,  
OPENAI, LLC, OPENAI OPCO LLC,  
OPENAI GLOBAL LLC, OAI  
CORPORATION, LLC, OPENAI  
HOLDINGS, LLC, and MICROSOFT  
CORPORATION,

Defendants.

Case No. 1:23-cv-10211-SHS

**[PROPOSED] ORDER OF DISMISSAL**

IT IS HEREBY ORDERED that all claims asserted by Plaintiff Maya Shanbhag Lang in the above-captioned actions be and hereby are dismissed without prejudice pursuant to Rule 41(a)(2) and Rule 21 of the Federal Rules of Civil Procedure, with each party to bear its own attorney's fees and costs. This voluntary dismissal is likewise made without prejudice to Ms. Lang's rights as a potential absent class member in the proposed and/or any certified classes.

It is so ORDERED.

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THE HONORABLE SIDNEY H. STEIN